GEORGE GUINDON, et al. Plaintiffs, vs. AMERICAN FOAM CORPORATION, et al. Defendants.	C.A No.: 03-335-L
LINDA RODERIQUES, et al. Plaintiffs, vs. AMERICAN FOAM CORPORATION, et al. Defendants .	C.A No.: 04-26-L
CHARLES SWEET, et al. Plaintiffs, vs. AMERICAN FOAM CORPORATION, et al., Defendants.	C.A No.: 04-56-L

DEFENDANTS ANHEUSER-BUSCH, INC. AND ANHEUSER-BUSCH COMPANIES, INC.'S ANSWER TO PLAINTIFFS' NOTICES OF ADOPTION OF THE THIRD AMENDED MASTER COMPLAINT

NOW COME Defendants Anheuser-Busch, Inc. ("ABI") and Anheuser-Busch Companies, Inc. ("ABC") and in response to the Notices of Adoption of Third Amended Master Complaint filed by Plaintiffs in each of the above-captioned cases, ABI and ABC hereby adopt their Answer and Affirmative Defenses to Plaintiffs' Third Amended Master Complaint, filed on March 17, 2006, in *Gray v. Derderian*, C.A. No. 04-312L.

BLISH & CAVANAGH
COUNSELLORS AT LAW
COMMERCE CENTER
30 EXCHANGE TERRACE
PROVIDENCE, RI 02903-1765

(401) 831-8900
FAX (401) 751-7542

To the extent Plaintiffs in each of the above-captioned cases rely upon the additional allegations and claims set forth in the Notices of Adoption and Pro Forma Complaints filed in each of the above-captioned cases on January 10, 2005, ABI and ABC hereby adopt their Answers to Pro Forma Complaint and Notice of Adoption of First Amended Master Complaint, filed in each of the above-captioned actions on February 4, 2005, as they relate to such additional allegations and claims.

WHEREFORE, Defendants Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. pray that:

(a) the Third Amended Complaint, Notice of Adoption and Pro Forma Complaint in each of the above-captioned cases be dismissed with prejudice as to Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc.;

(b) Plaintiffs' demand for relief against Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. In each of the above-captioned actions be denied in every respect;

(c) Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. be awarded costs in connection with each of the above-captioned actions, including reasonable attorneys' fees; and

(d) the Court grant such other and further relief as may be just, proper, and equitable.

ANHEUSER-BUSCH, INC. AND ANHEUSER-BUSCH COMPANIES, INC. HEREBY DEMAND TRIAL BY JURY IN EACH OF THE ABOVE-CAPTIONED CASES

ANHEUSER-BUSCH, INC. AND ANHEUSER-BUSCH COMPANIES, INC.,

By their Attorneys,

Joseph V. Cavanagh, Jr. # 1139
Kristin E. Rodgers #4842
BLISH & CAVANAGH, LLP
Commerce Center
30 Exchange Terrace
Providence, RI 02903
Telephone: (401) 831-8900
Facsimile: (401) 751-7542
stationfire@blishcavlaw.com

Dated: 3/17/06

Of Counsel:

Edward M. Crane, Esq. (Pro Hac Vice)
Deborah G. Solmor, Esq. (Pro Hac Vice)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
333 West Wacker Drive
Chicago, IL 60606
Telephone: (312) 407-0700
Telecopier: (312) 407-0411
ecrane@skadden.com
dsolmor@skadden.com

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a copy of the within document in pdf format by electronic email, unless otherwise indicated on the 17th day of March, 2006, to the following counsel of record:

Thomas Angelone, Esq.
angelonelaw@aol.com

Thomas R. Bender, Esq.
stationfire@hansoncurran.com

C. Russell Bengtson, Esq.
rbengtson@mklaw.com

Stephen E. Breggia, Esq.
sbreggia@bbglaw.us

James A. Bigos, Esq.
jim@b-plaw.com

Joseph B. Burns, Esq.
jburns@rms-law.com

Mark D. Cahill, Esq.
Eric Bradford Hermanson, Esq.
mcahill@choate.com

Brian R. Cunha, Esq.
Karen A. Alegria, Esq.
brian@briancunha.com
karen@briancunha.com

John R. Crockett, Esq.
jcrockett@fbtlaw.com

Michael R. DeLuca, Esq.
mrd@gsm-law.com

Gerald DeMaria, Esq.
gdemaria@hcc-law.com

Marc DeSisto, Esq.
Kathleen M. Daniels, Esq.
marc@desistolaw.com
kathleen@desistolaw.com

Edward T. Hinchey, Esq.
Ehinchey@sloanewalsh.com

Stephanie DiMaio-Larivee, Esq.
Singinglawyer@msn.com

Mark P. Dolan, Esq.
ricedolank@aol.com

Christopher C. Fallon, Jr., Esq.
cfallon@cozen.com

Stephen P. Fogerty, Esq.
fogerty@halloran-sage.com

Mark C. Hadden, Esq.
mhadden@mhaddenlaw.com

Nancy W. Hamilton, Esq.
nhamilton@jw.com

Carl A. Henlein, Esq.
John R. Crocket, III, Esq.
Susan A. Wettle, Esq.
chenlein@fbtlaw.com
jcrockett@fbtlaw.com
swettle@fbtlaw.com

Daniel J. Horgan, Esq.
horganlaw@snet.com

Stephen A. Izzi, Esq.
stephen.izzi@hklaw.com

Patrick T. Jones, Esq.
pjones@cmj-law.com

Howard J. Julian
sohohomes@yahoo.com

Bruce P. Keller, Esq.
Jessica L. Margolis, Esq.
Michael R. Pontenza, Esq.
bpkeller@debevoise.com
jmargolis@debevoise.com

Fred A. Kelly, Jr., Esq.
Steven M. Richard, Esq.
Ian C. Ridlon, Esq.
stationfirelitigation@nixonpeabody.com

Ronald P. Langlois, Esq.
Lauren D. Wilkins, Esq.
rlanglois@smithbrink.com
lwilkins@smithbrink.com

James R. Lee
jlee@riag.state.ri.us

Thomas W. Lyons, Esq.
tlyons@straussfactor.com

Richard W. MacAdams, Esq.
rmacadams@mandwlaw.com

Steven MacGillivray, Esq.
smacgillivray@eapdlaw.com

Linda Magro, Esq.
lmagro@hcc-law.com

John W. Mahoney, Esq.
johnmajoney@aamlawllp.com

Eva Marie Mancuso, Esq.
emancuso@hwac.com

Mark S. Mandell, Esq.
Yvette M. Boisclair, Esq.
msmandell@msn.com

Michael J. Mazurczek, Esq.
stationlitigaition@melicklaw.com

Allen J. McCarthy, Esq.
amccarthy@melicklaw.com

Joseph J. McGair, Esq.
jjm@petrarcamcgair.com

W. Thomas McGough, Jr., Esq.
James J. Restivo, Jr., Esq.
tmcgough@reedsmith.com
jrestivo@reedsmith.com

Edwin F. McPherson, Esq.
emcpherson@m-klaw.com

Matthew F. Medeiros, Esq.
mfm@lmkbw.com

Howard A. Merten, Esq.
Eric M. Sommers, Esq.
hm@psh.com

Steven A. Minicucci, Esq.
sminicucci@calvinolaw.com

Ralph J. Monaco, Esq.
Patrick J. Day, Esq.
rmonaco.c-l@snet.net

James T. Murphy, Esq.
Kelly N. Michels, Esq.
jtm@hansoncurran.com
knm@hansoncurran.com

John J. Nazzaro, Esq.
nazzjn@aol.com

Robert T. Norton, Esq.
rnorton@sloanewalsh.com

Mark T. Nugent, Esq.
Paul V. Sullivan, Esq.
mnugent@mail.mm-m.com
pvsullivan@morrisonmahoney.com

Stephen M. Prignano, Esq.
Stephen J. MacGillivray, Esq.
sprignano@eaapdlaw.com
smacgillivray@eapdlaw.com

Robert I. Reardon, Jr., Esq.
reardonlaw@aol.com

Charles N. Redihan, Jr., Esq.
credihan@kprlaw.com

James H. Reilly, III, Esq.
Donald J. Maroney, Esq.
jreilly@kkrs.com
dmaroney@kkrs.com

Ronald J. Resmini, Esq.
Ronald J. Creamer, Esq.
resminilaw@yahoo.com

Mark T. Reynolds, Esq.
Anthony F. DeMarco, Esq.
tdemarco@conversent.net

Earl H. Walker, Esq.
Nancy W. Hamilton, Esq.
Charles L. Babcock, Esq.
ewalker@jw.com
cbabcock@jw.com
nhamilton@jw.com

James J. Restivo, Esq.
jrestivo@reedsmith.com

James A. Ruggieri, Esq.
jruggieri@hcc-law.com

Peter Schnedier
pvsullivan@morrisonmahoney.com

Michael A. St. Pierre, Esq.
mikesp@rrplaw.com

Georgia A. Sullivan, Esq.
georgia.Sullivan@thehartford.com

Paul V. Sullivan, Esq.
pvsullivan@morrisonmahoney.com

Andrew J. Trevelise, Esq.
atrevelise@reedsmith.com

Mark D. Tourgee, Esq
Gregory S. Inman, Esq.
aminchillo@itwlaw.com

Scott J. Tucker, Esq.
stucker@ths-law.com

T. Dos Urbanski, Esq.
durbanski@melichlaw.com

Susan A. Wettle, Esq.
swettle@fbtlaw.com

Timothy A. Williamson, Esq.
aminchillo@itwlaw.com

Max H. Wistow, Esq.
mwistow@wistbar.com

George E. Wolf, III, Esq.
Ann M. Songer, Esq.
gwold@shb.com
asonger@shb.com

Joseph F. Krowski, Esq.
Law Offices of Joseph F. Krowski
30 Cottage Street
Brockton, MA 02301
VIA REGULAR MAIL